

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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FORA FINANCIAL HOLDINGS, LLC :
Plaintiff, : Case No. _____
vs. :
: :
: NEW YORK TRIBECA GROUP, LLC and :
: JOHN DOES 1-10, :
: Defendants. :
: :
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Jeffrey S. Kramer, Esq., of full age, hereby declares:

1. I am an attorney and partner of the law firm Locke Lord LLP, counsel for plaintiff Fora Financial Holdings, LLC (“Plaintiff”). I make this declaration based upon personal knowledge and in support of Plaintiff’s motion for expedited discovery.
2. Attached to this declaration are Plaintiff’s proposed expedited document requests, which include four requests to defendant New York Tribeca Group, LLC (“Tribeca”), and Plaintiff’s proposed interrogatory to Tribeca.
3. Plaintiff also requests that they be permitted to take the deposition of defendant Tribeca.
4. Attached hereto as **Exhibit A** is a true and correct copy of Plaintiff’s First Set of Requests for the Production of Documents to Defendant Tribeca.
5. Attached hereto as **Exhibit B** is a true and correct copy of Plaintiff’s First Set of Interrogatories to Tribeca.
6. Attached hereto as **Exhibit C** is a true and correct copy of Plaintiff’s Notice of Remote Deposition of Tribeca.

I declare under penalties of perjury under the laws of the United States and New York that the foregoing is true and correct.

Dated: October 6, 2022

s/Jeffrey S. Kramer
Jeffrey S. Kramer, Esq.